

RLC:BSK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-09-1103

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., § 963)

SLEIMAN LEE ANTUN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER MILLER, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration Organized Crime Strike Force (the "Strike Force"), duly appointed according to law and acting as such.

Upon information and belief, on or about November 6, 2009, within the Eastern District of New York and elsewhere, the defendant SLEIMAN LEE ANTUN did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 952(a).

(Title 21, United States Code, Sections 963.)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On November 5, 2009, early in the morning, a Cooperating Witness ("CW") arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard an Avianca flight from Bogota, Colombia. During a consensual search of the CW, Strike Force agents found approximately 850 grams of heroin and approximately \$159,000 of counterfeit U.S. currency. The heroin and the currency were both contained in the seams of carry-on items which the CW was carrying. Contained in one of the items, a brown bag, was the heroin and approximately \$30,000 in counterfeit U.S. currency. Two other carry-on items contained an additional approximately \$129,100 in counterfeit U.S. currency.

2. Acting at the direction of Strike Force agents, the CW placed a call to the individual in Colombia who had provided the CW with the heroin and currency ("John Doe #1"). This conversation was recorded. The CW told John Doe #1 that he/she had arrived safely and would await further instructions. On November 6, 2009, acting at the direction of the DEA agents, the CW called John Doe #1 in Colombia to obtain a contact telephone number for the person to whom the drugs were to be delivered. John Doe #1 gave the CW a telephone number and instructed the CW to call the telephone number and make delivery

facts and circumstances of which I am aware.

arrangements for the brown bag containing the heroin and the \$30,000 in counterfeit U.S. currency.

3. On November 6, 2009, acting at the direction of Strike Force agents, the CW placed several calls to the telephone number which John Doe #1 had given him/her. These calls were recorded. Initially, the individual who answered the telephone, referred to herein as "John Doe #2," informed the CW that he needed additional time to pick up the package. The CW told John Doe #2 to call the CW when John Doe #2 was in Queens and ready to make the exchange. The CW and John Doe #2 also agreed to make the exchange at the McDonalds in Queens.

4. I and other agents transported the CW to the McDonalds and the CW entered the restaurant and sat down in a booth. Some time later, John Doe #2 called the CW and informed the CW that "the guy" was there to make the exchange. While the CW remained on the telephone with John Doe #2, the CW observed defendant SLEIMAN LEE ANTUN enter the McDonalds, approach the CW and sit down at his/her booth. Defendant SLEIMAN LEE ANTUN stated to him/her, in sum and substance, "I'm here for the stuff, do you have it." The CW responded that he/she had it and asked defendant SLEIMAN LEE ANTUN if he had the money. Defendant SLEIMAN LEE ANTUN responded in the affirmative, pointed to his pocket, and directed the CW to look inside. The CW looked inside

defendant SLEIMAN LEE ANTUN's pocket and saw a package wrapped in black plastic.

5. After observing the black plastic package, the CW placed a call to an undercover Strike Force agent. The undercover Strike Force agent entered the McDonalds carrying the brown leather bag containing the heroin and the approximately \$30,000 in counterfeit U.S. currency, and approached the CW and defendant SLEIMAN LEE ANTUN. The CW told defendant SLEIMAN LEE ANTUN that "it" was in the brown bag; defendant ANTUN responded, in sum and substance, yes, I know, I have seen it before, referring to the brown bag. At that time, the undercover agent handed defendant SLEIMAN LEE ANTUN the brown bag. Defendant SLEIMAN LEE ANTUN reached into his pocket, removed the black plastic bag, and passed the bag to the CW under the table.^{2/} At that time, the CW informed defendant SLEIMAN LEE ANTUN that the CW would call down south, a reference to John Doe #1, the individual who had given the CW the heroin and counterfeit U.S. currency. Defendant SLEIMAN LEE ANTUN responded that the CW should not call down south, as "his boss" would talk to the guy down south.

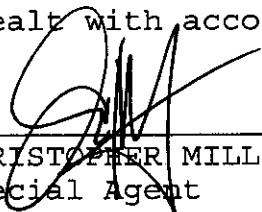
6. Defendant SLEIMAN LEE ANTUN got up and began walking towards the door of the restaurant. At that time, Strike

^{2/}It was later revealed that the black plastic bag contained approximately \$12,000 in United States currency.

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Force agents placed defendant SLEIMAN LEE ANTUN under arrest. After being advised of his Miranda rights and waiving those rights, defendant SLEIMAN LEE ANTUN responded that he had met some guy who offered him \$500 pick up some papers to deliver them to the guy in the Bronx.

WHEREFORE, your deponent respectfully requests that the defendant SLEIMAN LEE ANTUN be dealt with according to law.



CHRISTOPHER MILLER
Special Agent
Drug Enforcement Administration

Sworn to before me this
7th Day of November, 2009

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK